

UNITED STATES BANKRUPTCY COURT
NORTHERN DISTRICT OF GEORGIA
ATLANTA DIVISION

IN RE: COURTNEY TRICE,	{ CHAPTER 13
	{
	{
DEBTOR	{ CASE NO. A24-52036-PWB
	{
	{ JUDGE BONAPFEL

SUPPLEMENTAL OBJECTION TO CONFIRMATION

COMES NOW K. EDWARD SAFIR, CHAPTER 13 TRUSTEE herein, and objects to Confirmation of the plan for the following reasons:

1. The Chapter 13 petition and schedules fail to disclose real property in McDonough, GA in violation of 11 U.S.C. § 521 and Fed. R. Bankr. P 1007(b).

2. The Chapter 13 petition fails to include a debt owed to US Bank, in violation of Bankruptcy Rule 1007(a)(1) and 11 U.S.C. Section 1325(a)(3).

3. The proposed plan fails to provide for the treatment of US Bank. However, said creditor has filed a secured claim.

WHEREFORE, the Trustee moves the Court to inquire into the above objections, deny Confirmation of this Debtor's plan and to dismiss the case; or, in the alternative, convert the case to one under Chapter 7.

/s/
Brandi L. Kirkland, Attorney
for Chapter 13 Trustee
GA Bar No. 423627

K. Edward Safir, Chapter 13 Trustee
285 Peachtree Center Ave., NE
Suite 1600
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A24-52036-PWB

CERTIFICATE OF SERVICE

I hereby certify that on this day I electronically filed the foregoing pleading using the Bankruptcy Court's Electronic Case Filing program, which sends a notice of this document and an accompanying link to this document to the following parties who have appeared in this case under the Bankruptcy Court's Electronic Case Filing program:

CLARK & WASHINGTON, PC

I further certify that on this day I caused a copy of this document to be served via first-class United States mail, postage prepaid, on the following parties at the address shown for each:

COURTNEY TRICE
8635 FORREST POINTE COURT
JONESBORO, GA 30238

This 8th day of May, 2024

Respectfully submitted,

/s/
Brandi L. Kirkland, Attorney
for Chapter 13 Trustee
GA Bar No. 423627

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